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Connecticut After School Network

Testimony to the Select Committee on Children In Opposition to HB 6224

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Good morning, Representative Urban, and members of the Select Committee on Children. My name is Michelle Doucette Cunningham, and I am the Executive Director of the Connecticut After School Network, a statewide alliance representing parents and providers across the state. The Network's goal is to have high quality, affordable after school programs available to every Connecticut child and youth so that they grow up safe, healthy, educated, connected and employable.

I am here today, on behalf of the After School Network, to raise questions concerning House Bill 6224, *An Act Exempting Certain Nonprofit Organizations that Operate Drop-In Programs for Children from the State's Child Day Care Licensure Requirements* which would provide extend the exemption for drop in child care programs.

In brief, drop-in centers should be carefully defined to protect children's health and safety.

The current wording of HB 6224 would create confusion - is every nonprofit organization providing recreational, athletic and educational activities for school-age children exempt? Or only those that provide "drop-in programs"? What exactly is a "drop-in program"? How is it different than an after school child care program?

According to the National Child Care Information and Technical Assistance Center of the U.S. Department of Health and Human Services (<http://nccic.acf.hhs.gov/poptopics/dropin.html>):

Drop-in child care operates on an occasional basis for parents who may need temporary care while engaged in other activities. These programs are often found at shopping malls, resorts, health clubs, and other settings where the parents are on the premises. In many States, this type of care is exempt from licensing because it is not offered as regular ongoing care for children and may only operate for a few hours each day.

Connecticut currently does exempt programs where parents are on the premises for religious, recreational, educational and retail purposes. It also lists seven other categories of exemption, which include exemptions for:

- drop-in programs administered by a nationally chartered boys' and girls' club, which are primarily provided without parents on the premises; and
- religious educational activities administered by a religious institution exclusively for children whose parents or legal guardians are members of such religious institution, regardless of whether the parents are on the premises at the time.

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What is the driving the growing number of requests for exemptions?

One-size regulation does not fit the large variety of programs.

Connecticut Public Health Code §19a-79-1a through 19a-79-13 oversees all Child Day Care Centers and Group Day Care Homes, in which school-age programs are included. Yet, it is difficult to make a "one-size-fits-all" set of regulations apply fairly to all types of programs that serve very different ages in very different facilities.

It is much more expensive to run a licensed school-age care program than to run an exempt program. Licensed programs serving school-age children have mandatory staff to student ratio of one to ten, and experience and education requirements for the teachers in these programs. The list of health and safety requirements is extensive, as are the policy and procedures each program is required to follow. (Current child care regulations are more than fifty pages long.) These regulations protect children's health and safety, and promote high-quality care, but they come with a high price tag.

Current exemptions create an uneven playing field.

In some places, the exemption for school administered programs (and town-administered programs in school buildings) creates an uneven playing field where some licensed programs find it hard to compete for students with lower-cost exempt programs.

Increased number of unlicensed and exempted programs

The past two decades have seen a large decrease in the number of licensed after school "slots" while the number children served in unlicensed and exempt programs has greatly increased. These programs, whether exempt because a town or school administers them, or because they are operating illegally without a license, have no requirements for child staff ratio or other health and safety regulation. While many of these programs are run responsibly and provide excellent care, as a whole they much more likely to have inadequate supervision than licensed programs.

Summary

The Connecticut After School Network supports fair and consistent health and safety regulations for after school programs. We all want our children to be in healthy, safe environments. By carefully defining drop-in programs, the State can best protect children's health and safety while not imposing undue burden on programs that provide only occasional care.